REMARKS

In the Office Action dated November 2, 2005, claim 5 was objected to; claims 7 and 8 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,515,974 (Inoue); claims 3, 9-12, 17-22, 24, 27, and 28 were rejected under § 103 over Inoue in view of U.S. Patent No. 6,535,511 (Rao); claim 4 was rejected under § 103 over Inoue in view of U.S. Patent No. 6,195,705 (Leung); claims 5, 6, and 25 were § 103 over Inoue in view of U.S. Patent No. 6,839,339 (Chuah); and claims 13-16, 23, and 26 were rejected under § 103 over Inoue in view of Rao and Chuah.

The objection of claim 5 has been rendered moot by the amendment of claim 5.

Former independent claim 7 has been amended from independent form to dependent form, and now depends from independent claim 3. Therefore, the § 102 rejection of claim 7 has been rendered moot.

Claims 8, 11, 22, and 26 have been cancelled, without prejudice.

1. Claims 3 and 10

Independent claim 3 was rejected as being obvious over the asserted combination of Inoue and Rao. It is respectfully submitted that a *prima facie* case of obviousness has not been established with respect to claim 3 for at least the reason that no motivation or suggestion existed to combine the teachings of the cited references. *See* M.P.E.P. § 2143 (8th ed., Rev. 3), at 2100-135.

Inoue describes a mobile communications scheme that supports movement of mobile terminals across different address systems. However, as correctly noted by the Office Action, Inoue does not disclose a data packet having a payload portion that contains a private network address of a first node in a first wireless network. 11/2/2005 Office Action at 4.

In fact, Inoue describes conventional address translation in which the source and destination addresses in a *header* portion of a packet are translated. *See* Inoue, 9:51-57; 1:32-33. Inoue does not provide any suggestion of any desirability to embed a private network address into a payload portion of a data packet, or to translate the private network address contained in the payload portion of the data packet. Therefore, there did not exist any motivation or suggestion to modify the teachings of Inoue based on the teachings of Rao. *See In re Fritch,*

972 F.2d 1260, 1266, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992) ("The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the *desirability* of the modification.") (emphasis added).

In this case, Rao describes a border router 16 connected between hosts 24 in a private IP address space, and the Internet 22 in a public IP address space. There is no suggestion of any desirability of using the techniques described in Rao in the Mobile IP context of Inoue. The only apparent basis for piecing together the elements of Inoue and Rao, as performed by the Office Action, is impermissible hindsight that benefits from the disclosure of the present invention. The objective evidence indicates that in the mobile IP context described in Inoue, there existed no suggestion whatsoever of embedding a private network address into a payload portion that is then translated. Although Rao describes address information embedded in the payload of a packet, Rao is related to a wired network, not a mobile network or wireless network.

It is thus clear that no motivation or suggestion existed to combine the teachings of Inoue and Rao to achieve the claimed invention.

Independent claim 10 is similarly allowable over Inoue and Rao.

2. Claim 4

Independent claim 4 was rejected as being obvious over Inoue and Leung. Claim 4 has been amended to recite a method that comprises receiving a first Internet protocol (IP) packet having a payload portion containing a GTP data unit, where the IP packet has a header containing a private network address of a first node in a first wireless network, and the GTP data unit in the payload portion of the IP packet also contains the private network address of the first node. In addition, the method of claim 4 includes translating the private network address in each of the header and payload portion to a public network address.

As conceded by the Office Action in the rejection of claim 3, Inoue fails to disclose a packet that has a payload portion containing a private network address, or translating the private network address in the payload portion. Also, the Office Action conceded that Inoue fails to disclose receiving a packet that contains a GTP data unit. 11/2/2005 Office Action at 5. However, the Office Action relied upon Leung as disclosing GTP data units. *Id.* at 5-6.

Leung describes a system for automatically backing up (to provide redundancy) a home agent in Mobile IP. Leung, Abstract. Leung mentions that the redundancy techniques described

for Mobile IP can apply to other high level network protocols, including the GPRS Tunneling Protocol (GTP). Leung, 12:4-22. However, like Inoue, although Leung mentions network address translation, the network address translation performed in Leung is of addresses in the header. There is no mention or suggestion whatsoever by Leung of performing network address translation also in the payload portion of the data packet.

Therefore, since the hypothetical combination of Inoue and Leung does not teach or suggest all elements of claim 4, it is respectfully submitted that a *prima facie* case of obviousness cannot be established with respect to claim 4 over Inoue and Leung.

3. Claims 5 and 25

Independent claim 5 was rejected as being obvious over Inoue and Chuah. Claim 5 has been amended to recite a method that comprises receiving a first IP packet having a payload portion containing a private network address of a GPRS support node in a first wireless network, where the first IP packet also has a header containing the private network address of the first GPRS support node. Claim 5 further recites translating the private network address in each of the header and payload portion to a public network address.

As conceded by the Office Action, Inoue fails to disclose a packet having a payload portion containing a private network address, or the translation of the private network address in the payload portion to a public network address. As also conceded by the Office Action, Inoue also fails to disclose a GPRS support node. 11/2/2005 Office Action at 6. More particularly, Inoue fails to disclose or suggest receiving an IP packet having a payload portion that contains a private network address of a GPRS support node.

The Office Action cited Chuah as disclosing GPRS support nodes. *Id.* at 6. Chuah describes a UMTS core network that provides header compression for GTP-encapsulated packets. Chuah, Abstract. However, Chuah provides no suggestion whatsoever of translating any address information contained within a payload of an IP packet, as recited in claim 5. Therefore, the hypothetical combination of Inoue and Chuah fails to teach or suggest the subject matter of claim 5. A *prima facie* case of obviousness can thus not be established with respect to claim 5.

Independent claim 25 is similarly allowable.

4. Claim 18

Independent claim 18 has been amended to recite an interface to receive a data packet containing a header portion and a payload portion, where each of the header portion and payload portion contains a first network address of a GPRS support node, in combination with a network address translator module to translate the first network address in each of the header portion and payload portion to a second, different network address associated with the GPRS support node.

Claim 18 was rejected as being obvious over Inoue and Rao. However, neither Inoue nor Rao discloses or suggests receiving a data packet that contains a network address of a GPRS support node. Therefore, since the hypothetical combination of Inoue and Rao does not teach or suggest all elements of claim 18, a *prima facie* case of obviousness cannot be established for at least this reason. Moreover, as discussed above with respect to claim 3, no motivation or suggestion existed to combine the teachings of Inoue and Rao in the manner proposed by the Office Action.

5. Conclusion

Dependent claims are allowable for at least the same reasons as corresponding independent claims. Moreover, newly added dependent claims 29-33 are further allowable since none of the cited references disclose or suggest a PDP Context Create request carried in a packet as recited in the claims.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRT.0090US).

Respectfully submitted,

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